UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUL 13 2017

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Roberto A. Artiga
Environmental Services Manager
Longview Fibre Paper and Packaging, Inc.
d/b/a KapStone Kraft Paper Corporation
300 Fibre Way
P.O. Box 639
Longview, Washington 98632

Re: Requirement to Provide Information Pursuant to Section 114 of the Clean Air Act

Dear Mr. Artiga:

The enclosed Information Request is being issued to you pursuant to Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414. The Information Request applies to Longview Fibre Paper and Packaging, Inc., d/b/a KapStone Kraft Paper Corporation (KapStone) and its operations in Longview, Washington.

Under Section 114 of the CAA, the EPA is authorized to require the submission of records, reports, and other information for the purpose of determining whether any violations of the CAA have occurred and for other purposes of the CAA. This includes the authority to require the sampling of emissions. In accordance with this authority, you are hereby served the enclosed Information Request, and required to provide the requested information and documents in accordance with and in the time frames specified by the enclosed instructions. Please submit your written response to:

Roylene Cunningham, OCE-101
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

Please sign and return the enclosed Statement of Certification with your responses to this Information Request.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to this Information Request in a timely manner may lead to civil action to obtain compliance or to recover a civil penalty of not more than $93,750 per day of violation, or both, in accordance with Section 113 of the CAA, 42 U.S.C. § 7413. EPA also has authority under Section 113 to seek criminal penalties from any person who knowingly makes any false statement, representation, or certification in any document required pursuant to the CAA. Even if you fully comply with this Information Request, you may still be subject to administrative, civil, or criminal action as provided by the CAA.

The information requested must be submitted whether or not you regard all or part of it as a trade secret or confidential information. You may, if you desire, assert a claim of business confidentiality covering all or part of the information submitted, as provided in Section 114(c) of the CAA, 42 U.S.C. § 7414(c), and 40 C.F.R. Part 2, Subpart B. All information claimed as confidential should be contained on separate sheet(s) and should be clearly identified as "confidential," "trade secret," or "proprietary." Please note that you bear the burden of substantiating your confidentiality claim. Unless you make a claim at the time you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. Information subject to a business confidentiality claim may be disclosed by EPA only to the extent and pursuant to the procedures set forth in 40 C.F.R. Part 2, Subpart B. You should read the above-cited statutes and regulations carefully before asserting a business confidentiality claim because certain categories of information are not entitled to confidential treatment. In particular, emissions data, which includes information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of emissions data, are not entitled to confidential treatment.

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Thank you for your cooperation in this matter. Any technical questions regarding this Information Request should be directed to Roylene Cunningham at (206) 553-0513; for legal matters, contact Julie Vergeront, Office of Regional Counsel, at (206) 553-1497.

Sincerely,

Edward J. Kowalski
Director

Enclosures
1. Information Request
2. Performance Testing Procedures (Attachments A and B)
3. Statement of Certification

cc: Corporation Service Company
Registered Agent for KapStone

cc via email: Thomas Wood
Stoel Rives

Paul Duncan
KapStone

Roberto Artiga
KapStone

Stephanie Ogle
Washington State Department of Ecology

Shingo Yamazaki
Washington State Department of Ecology

Kay Shirey
Washington Attorney General's Office

KAPSTONE
LONGVIEW, WASHINGTON
INFORMATION REQUEST

DEFINITIONS

All terms used in this Information Request, including Attachments A and B, have their ordinary meaning unless such terms are defined below, elsewhere in this Information Request, in the Clean Air Act (CAA), 42 U.S.C. § 7401, or in 40 C.F.R. Parts 52, 60, or 63. For purposes of this Information Request:

1. "KapStone" means all employees and agents of Longview Fibre Paper and Packaging, Inc., d/b/a KapStone Paper Corporation, and its co-owners, parent corporations, and subsidiaries.

2. "Facility" means the Title V major source owned and operated by KapStone and located in Longview, Washington (at 300 Fibre Way).

3. "Ecology" means the Washington State Department of Ecology.

4. "Process Data" means, at a minimum, the following elements:
   - Sawdust mass feed rate (bone dry tons/hr) and wood species (percent);
   - Screw conveyor/metering screw rate in revolutions per minute (rpm);
   - Millwater into the screw conveyor/metering screw volumetric flow rate and temperature;
   - Cooking liquor (or any other substance added to the sawdust prior to the digester) volumetric or mass feed rate, as appropriate;
   - The following M&D Digester Inlet Valve parameters:
     - RPM;
     - Primary Exhaust (recycled) steam temperature and pressure;
     - Rotor pocket pre-purge steam temperature and pressure;
     - Rotor pocket purge steam temperature and pressure; and
     - Secondary exhaust temperature and pressure;
   - Digester production rate (tons of oven dried pulp (ODP)/hr);
   - Any other process parameter used by the Facility or testing firm in determining or calculating emission rates in all units of measure required by this Information Request.

5. "Sawdust Digester" means, for the purposes of this Information Request, the Messing and Durkee (M&D) No. 4 sawdust digester at the Facility.

6. "M&D Digester Inlet Valve" means the valve on the Sawdust Digester identified on page 4 of the slides labeled "M&D Digester Inlet Valve" of KapStone's presentation to EPA on May 30, 2017, and provided to EPA via email on June 2, 2017.

KAPSTONE
LONGVIEW, WASHINGTON
INFORMATION REQUEST

QUESTIONS

1. Methanol. Within 90 days of receipt of this Information Request, KapStone must conduct, for the Sawdust Digester, a performance test simultaneously measuring the mass emission rate of total Hazardous Air Pollutants (HAP) as methanol[1] at each of the following locations as provided in Attachment A:
   a. All lines or ducts from the M&D Digester Inlet Valve to cyclones or directly to atmosphere, including the "secondary exhaust" line. Testing must be conducted prior to any cyclone; and
   b. All vent(s) to atmosphere which have connectivity with the screw conveyor/metering screw.[2]

2. Total Reduced Sulfur (TRS). Within 90 days of receipt of this Information Request, KapStone must conduct, for the Sawdust Digester, a performance test simultaneously measuring the emission rate of TRS at each of the following locations as provided in Attachment A:
   a. All lines or ducts from the M&D Digester Inlet Calve to cyclones or directly to atmosphere, including the "secondary exhaust" line. Testing must be conducted prior to any cyclone; and
   b. All vent(s) to atmosphere which have connectivity with the screw conveyor/metering screw.

3. Advance Notification. By no later than 30 days before any performance test required by Paragraphs 1 or 2 above is conducted, or unless EPA agrees in writing to some other time period, KapStone must provide notice of its intent to conduct such test to EPA and Ecology. This notification must include the scheduled date of the test, and a complete emissions test protocol/plan. If EPA requires any adjustment of the emissions test protocol/plan or operating conditions, EPA will notify KapStone within 30 days of receipt of the notice, and KapStone must make such adjustments and conduct the performance test in conformity with EPA's requirements. The emissions test protocol/plan must, at a minimum, include and address the following elements:
   a. Purpose and scope of testing;
   b. Source description, including a description of the operating scenarios and mode of operation during testing;
   c. Schedule/dates of testing;
   d. Process Data collected (as provided in Attachment A, all Process Data must be collected and reported at the frequency collected by the Facility, with a minimum frequency of at least one data point per hour; must cover the time period beginning 30 days prior to the

[1] Under 40 C.F.R. § 63.457(f), total HAP concentration shall be measured as one of the following: (1) As the sum of all individual HAPs; or (2) As methanol.
[2] EPA observed three such vents to atmosphere during an on-site inspection on August 24, 2016.

performance testing and continuing until five days after the testing is concluded; and must be reported with the date and time of collection);

e. Sampling and analysis procedures, specifically requesting approval for any proposed alternatives to the reference test methods, and addressing minimum test length and minimum sample volume;
f. Sampling location description and proposed means of compliance with the reference test methods;
g. Appropriate piping and instrumentation diagrams depicting all proposed testing locations with the precise proposed sample collection point marked;
h. Analysis procedures and laboratory identification;
i. Quality assurance plan including Data Quality Objectives;
j. Calibration procedures and frequency;
k. Sample recovery and field documentation;
l. Chain of custody procedures;
m. Quality Assurance (QA)/Quality Control (QC) project flow chart;
n. Data processing and reporting;
o. Description of data handling and QC procedures; and
p. Report content and timing.

4. Report of Results. Within 45 days after conducting a performance test required under Paragraphs 1 or 2 above, KapStone must submit to EPA and to Ecology a report documenting the results of the performance test that includes, at a minimum, the following information:
   a. General identification information for the Facility including a mailing address, the actual address, the owner or operator or responsible official (where they are applicable) or an appropriate representative and an email address for this person;
   b. Identification of emission point/vent(s) being tested, performance test dates, pollutant(s) being measured, the units of the standard or the pollutant emissions units;
   c. A brief process description;
   d. A complete unit description, including a description of feed streams and control devices, the appropriate source classification code (SCC), and the permitted maximum process rate (where applicable);
   e. Summary page including:
      i. Emission results, expressed in units identified in Table 1 of Attachment A; and
      ii. Discussion of errors or problems encountered, both real and apparent;
   f. Sampling site description; description of sampling and analysis procedures and any modifications to standard procedures; and quality assurance procedures;
   g. Record of operating conditions during the test, including operating parameters for which emissions are being measured; record of preparation of standards; and record of calibrations;
   h. Process Data collected (as provided in Attachment A, all Process Data must be collected and reported at the frequency collected by the Facility, with a minimum frequency of at least one data point per hour; must cover the time period beginning 30 days prior to the performance testing and continuing until five days after the testing is concluded; and must be reported with the date and time of collection);
   i. Raw data sheets for field sampling;
   j. Raw data sheets for field and laboratory analyses;
   k. Chain-of-custody documentation;
   l. Explanation of laboratory data qualifiers;

m. Documentation of the determination of Method Detection Limit;
n. Example calculations of all applicable stack gas parameters, emission rates, percent reduction rates, and analytical results, as applicable. The report must include a description of all assumptions made in conducting the calculations and the basis for all data used in the calculations. Sufficient detail must be provided to enable EPA to duplicate the calculations using basic input data. In particular, this level of detail must be provided for calculations performed in determining emission rates measured during testing;
o. Identification information for the company conducting the performance test including a contact person and his/her email address; and
p. Any other information required by the test method, a relevant standard, or the EPA.

5. Additional Information. Concurrently with the submission of the last performance test report required to be submitted under this Information Request, provide:
   a. The dates and results of all tests not previously provided in response to this Information Request that evaluated either the TRS content or methanol concentration of emissions from the Sawdust Digester, any rotary valve on the Sawdust Digester, or any other portion of the sawdust feed system associated with the Sawdust Digester, including but not limited to the vent(s) identified in Paragraphs 1 or 2 above; and
   b. The date of the most recent rebuild or significant maintenance of the M&D digester inlet valve to ensure the spacing between the valve vanes/rotors and the valve casing meets applicable specifications.

ATTACHMENT A

Performance Testing Procedures and Methods for the Information Request for KapStone, Longview, Washington

The Information Request requires emissions and other test data for multiple pollutants. Please refer to the Information Request for additional testing information, including the specific locations and pollutants to be tested at the Facility.

1.1 How to Select Sample Location

KapStone must use EPA Method 1 of Appendix A of 40 C.F.R. Part 60 to select the precise locations in the ducting at the emission points/vents specified by EPA in Paragraphs 1 and 2 of the Information Request-Questions, as well as the number of traverse points for sampling except as otherwise specified in section 1.2 and Table 1 below. If the physical configuration of the ducting at the sampling points specified by EPA precludes sampling in accordance with Method 1 criteria, KapStone must describe any deviations from Method 1 in the test protocol and provide supporting reasoning. See https://www.epa.gov/emc/method-1-samplevelocity-traverses for a copy of the method and guidance information for sampling situations not meeting Method 1 criteria.

1.2 Test Methods and Reporting

Table 1 presents a summary of the required test methods for each pollutant. For copies of the U.S. EPA methods, Performance Specifications (if applicable) and additional information, please refer to EPA's Emission Measurement Center website: https://www.epa.gov/emc.

KapStone must use the limit of detection (LOD), also known and referred to here as the method detection limit (MDL) determination procedure, in EPA Method 301, Section 15 to develop the MDL. The MDL must be determined in the same matrix as the samples that will be analyzed.

Each test must include a minimum of three valid test runs for each target pollutant at each sampling location specified in the Information Request.

Each Sawdust Digester and associated equipment being tested must be operated during testing under conditions that are representative of normal production and operation.

All pollutant concentrations must be reported on a dry moisture basis at standard conditions. The recommended units of concentration for each pollutant vary, and are listed in Table 1. Results of the performance tests must be reported as provided in Paragraph 4 of the Information Request-Questions.

In addition to the emission test data, KapStone must also collect and report the Process Data covering the time period beginning 30 days prior to the performance testing and continuing until five days after the testing is concluded. All Process Data must be at the frequency collected by KapStone, with a minimum frequency of at least one data point per hour and with the date and time of collection. The correlation between emissions measurements and Process Data (e.g., identify Method 16, run 1 for the associated Process Data) must be made clear in the Report.

Table 1 lists the pollutants and associated methods for testing KapStone's Sawdust Digester.

Table 1: KapStone's Sawdust Digester– Pollutants and Test Methods

Location/Pollutant[1]	Test/Analysis Method	Comments	Units of Measure
All lines or ducts from the M&D Digester Inlet Valve to cyclones or directly to atmosphere, including the "secondary exhaust" line. Testing must be conducted prior to any cyclone; and All vent(s) to atmosphere which have connectivity with the screw conveyor/metering screw.[2]	EPA Method 308	Collect a minimum volume of 60 liters per run. Remove the silica gel sorbent tube prior to the final system leak check required in 8.1.3. Samples must be shipped on ice and arrive at lab < 20 deg. C.	ppmdv, lb/hr, lb/ton of ODP
	EPA Method 16	Conduct a minimum of 16 injections per test run over not less than three hours and no more than six hours.	ppmdv, uncorrected for oxygen content, lb/hr, lb/ton of ODP
	EPA Methods 1 & 2	Conduct a flow traverse for duct velocity calculation.	dscf/hr
Methanol, TRS, flow rate, moisture	EPA Method 4	Collect a minimum volume of 21 dscf at 0.75 cfm.	% H2O

See Attachment B for information on how to calculate and report values measured below MDLs.

[1] See page 4, slides labeled "M&D Digester Inlet Valve" of KapStone's presentation presented to EPA on May 30, 2017, and provided via email on June 2, 2017.

[2] EPA observed three such vents to atmosphere during an on-site inspection on August 24, 2016.

ATTACHMENT B

Calculating and Reporting Values Measured Below Method Detection Levels (MDL)

- Identify the status of measured values relative to detection levels on the performance test report using the following descriptions:
    - **BDL** (below detection level) – all analytical values used to calculate and report an in-stack emissions value are less than the laboratory's reported detection level(s).
    - **DLL** (detection level limited) – at least one but not all values used to calculate and report an in-stack emissions value are less than the laboratory's reported detection level(s).
    - **ADL** (above detection level) – all analytical values used to calculate and report an in-stack emissions value are greater than the laboratory's reported detection level(s).

- For reporting and calculating individual test run data KapStone must use a scientifically acceptable approach to develop the method detection limit. The MDL must be determined in the same matrix as the samples that will be analyzed. Use the MDL determination procedure in EPA Method 301, Section 15. For analytical data reported from the laboratory as "nondetect" or "below detection level:"
    - Include a brief description of the procedures used to determine the analytical detection and in-stack detection levels;
    - Describe these procedures completely in the full test report including the measurements made, the standards used, and the statistical procedures applied;
    - Calculate the in-stack emissions rate for any analytical result reported as below detection level using the relevant analytical detection level as the reported value. **Note that the analytical detection level used in this calculation is not the analytical reporting level many laboratories provide. The analytical detection level is most often defined as the minimum concentration of a substance that can be measured and reported with 99 percent confidence that the value is above zero.[3] The analytical reporting level is often an arbitrary multiplication of the method detection level;**
    - Report the calculated emissions concentration or rate result as a bracketed "less than" detection level value (e.g., [<0.0105]); and
    - Report as numerical values (i.e., no brackets or < symbol) any analytical data measured above the detection limit including any data between the analytical detection level and a laboratory-specific reporting or quantification level (i.e., flag as ADL, see below).

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[3] SW 846 Method 8000D, Determinative Chromatographic Separations, https://www.epa.gov/hw-sw846/sw-846-test-method-8000d-determinative-chromatographic-separations

- For pollutant measurements composed of multiple components or fractions (e.g., mercury and other metals sampling trains) when the result for the value for any component is measured below the analytical detection level:
    - Calculate in-stack emissions rate or concentrations as outlined above for each component or fraction;
    - Sum the measured and detection level values as outlined above using the in-stack emissions rate or concentrations for all of the components or fractions; and
    - Report the sum of all components or fractions as a bracketed "less than" detection level value (e.g., [<0.0105]);
    - Report also the individual component or fraction values for each run.

- For measurements conducted using instrumental test methods (e.g., Methods 3A, 6C, 7E, 10, 25A):
    - Record gaseous concentration values **as measured** including negative values and flag as ADL; do not report as BDL;
    - Calculate and report in-stack emissions rates using these measured values; and
    - Include relevant information relative to calibration gas values or other technical qualifiers for measured values as discussion in your test report.

- For reporting and calculating average emissions rate or concentration for a test when some results are reported as BDL:
    - Sum all of the test run values including those indicated as BDL or DLL as numerical values; and
    - Calculate the average emissions rate or concentration (e.g., divide the sum by three for a three-run test). Report the average emissions rate or concentration average.

Enclosure 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

IN THE MATTER OF:	)	
	)	
Longview Fibre Paper and Packaging, Inc.	)	
d/b/a KapStone Paper Corporation,	)	STATEMENT OF CERTIFICATION
Longview, Washington	)	
Respondent.	)	
_____	)	

I, _____, hereby certify that the enclosed response to the above-captioned Information Request is true, accurate, and complete. I certify that the portions of this response which I did not personally prepare were prepared by persons acting on behalf of the Respondent, under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I make this certification both on my own behalf, and on behalf of the Respondent, as its authorized representative.

Dated:_____ Signature:_____

Printed Name:_____

Title:_____